

Greenberg Traurig, LLP  
3773 Howard Hughes Parkway - Suite 400 North  
Las Vegas, Nevada 89109  
(702) 792-3773  
(702) 792-9002 (fax)

MARK E. FERRARIO  
Nevada Bar No. 1625  
ferrariom@gtlaw.com  
KARA B. HENDRICKS  
Nevada Bar No. 7743  
hendricksk@gtlaw.com  
GREENBERG TRAURIG, LLP  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, Nevada 89169  
Telephone: (702) 792-3773  
Fax: (702) 792-9002

*Attorneys for Defendants  
Clark County School District,  
Edward Goldman, James Ketsaa and  
Christopher Klemp*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

DANIEL M. BURGESS, an individual;  
ANTHONY RUSSO, an individual,

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT, a  
political subdivision; EDWARD GOLDMAN,  
an individual; JAMES KETSAA, an  
individual; CHRISTOPHER KLEMP, an  
individual,

Defendants.

Case No. 2:17-cv-00805-GMN-VCF

**STIPULATION FOR EXTENSION OF  
TIME TO FILE REPLY IN SUPPORT OF  
MOTION TO DISMISS BURGESS'  
CLAIMS**

**(Second Request)**

It is hereby **STIPULATED AND AGREED** between Plaintiff Daniel M. Burgess ("Burgess") and Defendants, by and through their undersigned counsel, that Defendants will have additional time to file their reply in support of their motion to dismiss Burgess' claims up to and including **August 30, 2017**. This extension is requested as the Early Neutral Evaluation Session held on July 25, 2017 resulted in meaningful settlement discussions, and the parties wish to avoid incurring additional costs and fees while they actively pursue settlement. A status check regarding settlement is currently scheduled for August 16, 2017. This extension provides two weeks following the status check for Defendants to file the reply. Defendants' motion to dismiss Burgess'

claims was filed on May 26, 2017 (ECF No. 10). Pursuant to stipulated extensions of time, Plaintiff Burgess filed his opposition on July 11, 2017, and Defendants' reply is currently due on August 1, 2017. This is the second request for an extension of time to file the Burgess reply.

The above stipulated extensions do not affect the deadlines for Defendants' reply in support of its motion to dismiss the claim of the other plaintiff, Anthony Russo.

DATED this 28th day of July, 2017.

DATED this 28th day of July, 2017.

GREENBERG TRAURIG, LLP

MAIER GUTIERREZ & ASSOCIATES

/s/ Kara B. Hendricks

/s/ Jason R. Maier

MARK E. FERRARIO, ESQ.  
Nevada Bar No. 1625  
KARA B. HENDRICKS, ESQ.  
Nevada Bar No. 7743  
3773 Howard Hughes Parkway, Suite 400 N  
Las Vegas, NV 89169  
*Counsel for Defendants*

JOSEPH A. GUTIERREZ, ESQ.  
Nevada Bar No. 9046  
JASON R. MAIER, ESQ.  
Nevada Bar No. 8557  
8816 Spanish Ridge Avenue  
Las Vegas, NV 89148  
*Counsel for Plaintiff Daniel M. Burgess*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

DATED this 28 day of July, 2017.

**IT IS FUTHER ORDERED** that the Stipulation for Extension of Time, (ECF No. 28), is **DENIED** as improperly filed.